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Attorneys for Defendant Sayers Construction, LLC

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA

UNITED STATES *ex rel.* FOOTHILLS
ENERGY SERVICES, INC., a Colorado
corporation,

Plaintiff,

vs.

PHILADELPHIA INDEMNITY INSURANCE
COMPANY, a Pennsylvania corporation;
SAYERS CONSTRUCTION, LLC, a Texas
limited liability company;

Defendants.

Case No.: 2:19-cv-02016-KJD-DJA

**JOINT STIPULATION TO EXTEND
TIME FOR SAYERS CONSTRUCTION,
LLC TO FILE ANSWER OR
OTHERWISE RESPOND TO
PLAINTIFF'S COMPLAINT**

Pursuant to LR IA 6-1, Foothills Energy Services, Inc. ("Foothills"), Plaintiff in this action, and Defendant Sayers Construction, LLC ("Sayers") (collectively, the "Stipulating Parties") hereby stipulate as follows:

- 1 1. Sayers' time to file an answer or otherwise respond to Foothills' Complaint (Dkt. No. 1) is
- 2 hereby extended fourteen (14) days to Friday, January 17, 2020.
- 3 2. Sayers' request was made in good faith. Sayers' counsel requested that Sayers and Foothills
- 4 agree to this proposed joint stipulation in light of Sayers' requiring time to retain counsel
- 5 and Sayers' counsel's travel schedule the weeks of December 23, 2019, and December 30,
- 6 2019. Foothills' counsel agreed to an extension of Sayers' deadline to file an answer or
- 7 otherwise respond to Foothills' Complaint from January 3, 2020, to January 17, 2020.

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1 The Stipulating Parties respectfully submit the foregoing and request that the Court enter the
2 Order included below.

3 Respectfully submitted this 2nd day of January 2020.

4 **COZEN O'CONNOR**

5 By: /s/ Amy B. Alderfer

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26 Attorneys for Defendant Sayers Construction, LLC

27 **GREENSPOON MARDER LLP**

28 By: /s/ Phillip A. Silvestri

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Attorneys for Plaintiff
Foothills Energy Services, Inc.

SIGNATURE ATTESTATION

I hereby attest that all signatories listed above, on whose behalf this stipulation is submitted, concur in the filing's content and have authorized the filing.

COZEN O'CONNOR

By: /s/ Amy B. Alderfer

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Attorneys for Defendant Sayers Construction, LLC

IT IS SO ORDERED:



Daniel J. Albregts
United States Magistrate Judge

DATED: January 6, 2020